

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

MIDWAY MANUFACTURING COMPANY: Deposition of
vs. : William L. Harrison
THE MAGNAVOX COMPANY : Fifth Day
and : 74 Civ 1657 CBM
SANDERS ASSOCIATES, INC. : James T. Williams
----- West Washington Street,
Chicago, Illinois.

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

THE MAGNAVOX COMPANY, et al : Consolidated Actions
vs. : 74 C 1030
BALLY MANUFACTURING : 74 C 2510
CORPORATION, et al : 75 C 3153
----- : 75 C 3933
----- : HARRISON

Continued deposition taken
pursuant to subpoena and notice at the Sanders Associates,
Inc.; Headquarters, Spit Brook Road; Nashua, New Hampshire;
Thursday, March 25, 1976; commencing at 9:30 in the
forenoon.

ERNEST W. NOLIN & ASSOCIATES

General Stenographic Reporters

369 ELGIN AVE., MANCHESTER, N. H. 03104

TELEPHONE: 623-6906

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you now proceed with PRESENT: was to that question?

A. Yes, sir. Exhibit 23-100 For Midway Manufacturing Company, Bally Manufacturing Corporation and Empire: and

gate circuit for cos: Donald L. Welsh, Esq., 135 South LaSalle Street, Chicago, Illinois.

(Discussion off the record.)

For Sanders Associates, Inc., and Magnavox Company:

Indicates to me: Exhibit 23-100

James T. Williams, Esq., 77 West Washington Street, Chicago, Illinois.

indicates that I attempted to do more

but it is not clear to me at this time how I did

For Sanders Associates:

that. Exhibit 23-101 indicates to me that I

Richard I. Seligman, Esq.,

attempted to do more Daniel Webster Highway, South, Nashua, New Hampshire.

to reduce component count and cost. Exhibit 23-102

Stenotype Reporter:

indicates to me that an attempt was made to cause

Ronald J. Hayward

the target spot to move upon hit in the target-

shooting game WILLIAM L. HARRISON indicates to me

called as a witness, having been previously sworn, was

further examined and continued his testimony as follows:

hit and I modified the circuit to improve the (Interrogatories by Mr. Welsh.) disappearance.

Q. During the period from October 10, 1967, until

Q. that dot disappearance, I am, was in connection October 23 when you first began to aid Mr. Rusch, with the target game?

would you tell us what you did, if anything, on

A. I believe it would have been any game that used the TV game project? And I believe you had gotten the SCA to cause the dot to disappear.

through Exhibit 23-99 or at least up to it. Would

you now proceed with your answer to that question?

A. Yes, sir. Exhibit 23-99 indicates to me that I attempted to simplify the chroma oscillator and gate circuits for cost reduction purposes.

obtained so I modified the circuit to yield a
(Discussion off the record.)
constant video level from one or multiple signals

that were displayed. THE WITNESS: Exhibit 23-1003-10

indicates that I attempted to make multiple dots,

but it is not clear to me at this time how I did

that. Exhibit 23-101 indicates to me that I

attempted to do more simplification of circuits in
to reduce component count and cost. Exhibit 23-102

indicates to me that an attempt was made to cause

the target spot to move upon hit in the target-

shooting game. Exhibit 23-103 indicates to me

that the crowbar circuit did not completely

eliminate the target spot from the screen on a

hit and I modified the circuit to improve the dot
disappearance. I notice

Q. That dot disappearance, then, was in connection
with the target game? period from October 23, 1957,

A. I believe it would have been any game that used

the SCR to cause the dot to disappear. Exhibit 23-104

Exhibit 23-104 indicates to me that the method of summing spot signals were such that when two spots were coincident or any of the video signals were coincident, a difference in light level would be obtained so I modified the circuit to yield a constant video level from one or multiple signals that were displayed at the same time. Exhibit 23-105 indicates to me that an attempt to produce a simple two-spot baseball game was made. Did you have

Q. How was that game intended to be played?

A. The batter has control of the vertical positioning of the bat to intercept the ball when it is released by the pitcher; and if coincidence is detected, you score a hit by making the ball disappear or, a strike would be indicated with no coincidence and the ball would pass to the left side of the screen.

Q. I believe Exhibit 23-106 was where you indicated that you had begun to assist Mr. Rusch. I notice that the pages of Exhibit 23 following that extending up to 23-163 cover a period from October 23, 1967, until December 22, 1967. Then commencing on December 27 of '67, your entries in Exhibit 25 begin.

Did your resumption of making entries in Exhibit 25 on December 27 mean that you began doing something other than just aiding Mr. Rusch? 23-133.

MR. WILLIAMS: If you recall, Mr. Harrison, I think I should note for the record that at least some of the documents bearing numbers between 23-106 and 23-163 do not appear to have any dates on them at all. In response, the previous question was read back.

MR. WELSH: Did you have any specific ones in mind?

MR. WILLIAMS: At least my copy of 23-118 does not appear to have a date on it. That time to try to reduce the complexity of

Q. Does 23-118 in the actual Exhibit 23 have a date, Mr. Harrison?

A. Which one is that? Reducing the complexity undertaken

Q. 23-118. by yourself?

A. I do not see a date, sir.

Q. How about 23-119? belief in that regard?

A. I do not see a date, sir. see the complexity?

Q. And 23-120?

A. I do not see a date, sir. Rusch was not attempting to

do something along the MR. WELSH: Did you notice any

Q. others, Mr. Williams? in a bound notebook, MR. WILLIAMS: Not so far, but I have not completed my review. 23-131.

something other than THE WITNESS: I do not see a

A. date on Exhibit 23-131. May I have the question

Q. again? Have any belief in that regard?

A. I do not have a belief at this time.

(Whereupon, the previous

Q. Why did you commence making entries in the notebook question was read back as distinguished from on separate sheets such as by the reporter.)

23-135 to 23-137

A. I do not recall, sir. THE WITNESS: Exhibit 25,

Q. page 1, indicates to me that I took on the task

at that time to try to reduce the complexity of the circuitry that I had been working on with

Mr. Rusch. as an assumption. It seems

Q. Was that work of reducing the complexity undertaken by you by yourself? THE WITNESS: I do not recall

A. I do not recall.

Q. Do you have any belief in that regard? in pages 1 to

A. That I alone tried to reduce the complexity?

Q. Yes. approximately from December 27, 1967,

A. I do not know that Mr. Rusch was not attempting to do something along these lines also. is nearly -

Q . Does the fact that you did commence making entries in a bound notebook, Exhibit 25, as of that time when you took that task indicate that you were doing something other than just aiding Mr. Rusch? I recall

A. I do not recall. I do not recall over a year

Q. Do you have any belief in that regard? I recall

A. I do not have a belief at this time. I recall

Q. Why did you commence making entries in the notebook as distinguished from on separate sheets such as

A. 23-106 to 23-163? I recall, sir.

A. I do not recall, sir. I do not recall

Q. Do you have any idea? Any assumption in that regard? I recall from entries on

MR. WILLIAMS: I object to the question as calling for an assumption. It seems to request pure speculation from the witness. I leave

THE WITNESS: I do not recall why. I do not recall

Q. Now, I note further that the entries on pages 1 to 17 of Exhibit 25 extend only for a period of approximately one month, from December 27, 1967, til January 23, 1968, and then the next entry on page 18 is on November 4, 1968, which is nearly -

well, it is over nine months later. I also note that with the Exhibits 23-186 through 23-193, which are in January of 1968 - also Exhibit 194 - that there are no subsequent entries in Exhibit 23 until August of 1969, which is, of course, over a year later. Do these facts regarding the periods of time of the entries assist you in any way in pages determining or recalling why you had returned to the bound notebook method of keeping your notes?

A. I don't understand the question, sir.

Q. Well, to review, you stated you did not recall has why you began making entries in Exhibit 25, a bound notebook, as distinguished from entries on loose sheets such as in Exhibit 23. My question was whether the fact that the entries in the first seventeen pages cover only one short period of less than a month with the next following entry being nine months later, whether that helps you recall in any way why you began making entries in the bound notebook or does the subject matter of the first seventeen pages help you recall why you began the making entries in the notebook? mean by most

A. No, sir, it does not. Value.

Q. Now, you reviewed the entries in Exhibit 23 from page 106 of October 23, 1967, to Exhibit 23-163, which is dated 12-22-67. Do the entries in those pages relate to work in which you aided Mr. Rusch?

MR. WILLIAMS: Well, I object to the question. It covers some fifty plus pages of documents.

MR. WELSH: He has already gone through each of them.

MR. WILLIAMS: I agree he has at least looked at them. I don't know what he had in mind when he looked at them. I think there may be a different response to that question depending on which particular document he is referring to. I think the question is vague and calls for multiple answers.

THE WITNESS: I believe that many of them do, but not necessarily all of them.

Q. Do most of them?

MR. WILLIAMS: I object to the question. I don't know what you mean by most of them, I think it is vague.

Q. And what is there about Exhibit 23-131 which makes you uncertain as to whether that involved work in which you were aiding Mr. Rusch?

A. I have no recollection as to what it means.

Q. Do the entries on that page have any significance to you at all?

A. Not at this time, sir.

Q. The page is one of those which had been noted as being undated, I believe, is it not?

A. Yes, sir, it is.

Q. In connection with your work aiding Mr. Rusch, what did the term wall bounce mean?

Q. Did he make entries? MR. WILLIAMS: If you recall, Mr. Harrison.

A. What is meant by it? THE WITNESS: In this time period, sir?

Q. No, what did it mean at the time you were working with Mr. Rusch?

A. So in the time period we were covering?

Q. Yes, I am sorry. When you said this time period - yes, in the time period represented by your work on these notes, Exhibits 23-106 to 23-163.

A. As I recall, it meant to bounce a symbol off the

edges of the screen, top, bottom and both sides.

Q. Did Mr. Rusch ever discuss with you the possibility of a bounce of a ball image off of a fixed wall image as distinguished from the edge of the screen?

A. When you say did he ever - - -

Q. During the time period.

A. I do not recall.

Q. Do you have any belief as to whether he discussed that with you?

A. No, sir, I do not.

Q. Did he ever show you entries in his notebook?

A. I am sure he did.

Q. Did he make entries in his notebook in your presence?

A. What is meant by in my presence?

Q. When you were there.

A. In the area?

Q. Yes.

A. Yes, I am sure he did.

Q. Did you see him make entries?

A. I do not recall.

Q. Did he refer to entries in his notebook in discussing what work you might be doing to aid him?

A. I am sure he did, sir.

Q. Do you recall in your work with Mr. Rusch during this time period any reference to a game such as pool or billiards?

A. Yes, sir.

Q. What do you recall in that respect?

A. That we at least discussed it or attempted to build circuitry to try such a game.

Q. Did that circuitry include components for generating an image for the edge of the pool table or billiards table?

A. I do not recall, sir.

Q. Did you actually construct circuits while you were working with Mr. Rusch during this time period to obtain what you were referring to as wall bounce?

A. Yes, sir.

Q. Do your entries on Exhibits 23-151 and 152 relate to that work?

A. I believe they do, sir.

Q. Do these exhibits disclose some means for affecting what you referred to as wall bounce?

A. I didn't hear the question.

Q. What you referred to as wall bounce.

A. I didn't hear the first part of the question.

MR. WELSH: Could you read it?

(Whereupon, the previous question was read back by the reporter.)

THE WITNESS: Yes, sir, it does.

Q. What is that means?

A. That upon the ball or symbol, the moved symbol reaching some position on the screen, a voltage is detected that causes a flipflop to change state which in turn via transistor switches, changes the direction of the integrator which controls the ball movement.

MR. WELSH: May I have the last part of that answer, please?

(Whereupon, the previous answer was read back by the reporter.)

THE WITNESS: By that, I meant

the direction of the integration.

7 *High* Q.

The ^{SIGN} ~~sign~~?

A. Yes.

Q. From plus to minus or minus to plus?

A. Yes, sir.

Q. You stated that upon the ball or symbol reaching some position on the screen, could that position be varied?

A. Do you mean to set the limits of where the wall bounce takes place?

Q. Yes. Could it have been varied?

A. Yes. I believe it could.

Q. So that you could actually, instead of having the ball bounce off of the right edge of the screen, have it bounce from, say, a vertical line, say, 2 inches in from the right edge of the screen, is that correct?

A. Yes, sir.

Q. Was that change made by varying some resistor or how was it made? Or how could it have been made, that change in the position where the ball

upon reaching it would change direction?

MR. WILLIAMS: Are you calling for the speculation as to how it might have been? If so, I object to the question.

Q. Well, what in the circuit made it possible to do that? Is the improvement that Exhibit 23-152 has over

A. The zener diode threshold devices.

Q. Are those shown on either of these exhibits?

A. Yes, sir, they are shown on both exhibits.

Q. Where are they located on Exhibit 151?

A. The right center of the page. They connect between the resistor and the base of a transistor. Labeled 1N753, that is one of them. The other is to the left of that, almost center of the page, connected between two resistors and the base of another transistor. circuitry to it, that it must have

Q. What is the relation of the circuit of the diagram of 152 to Exhibit 23-151? recall.

A. The relationship?

Q. Yes, is one a redraw of the other or something of that nature?

A. Exhibit 23-152, I believe, is an improvement. It is a redraw, but also an improvement.

Q. Of Exhibit 151?

A. Yes, sir. ... such as a point ...

Q. It also has more values for the circuit elements, does it not, more identification? ...

A. Yes, sir, it does. ...

Q. What is the improvement that Exhibit 23-152 has over that of Exhibit 23-151? ...

A. I do not recall at this time what the improvement was. ...

Q. When you were describing the relationship of the circuitry of 152 or 151, I believe you made reference to an improvement, what improvement were you referring to? ...

A. Well, I think I made that statement, sir, because of the fact that I redrew it on the following day and I added circuitry to it, that it must have been for improvement purposes. Exactly what the improvement was, I do not recall. ...

Q. Now, could you point out the zener diodes on Exhibit 23-152? ...

A. One of them would be near the bottom of the diagram, a zener labeled 1N755 and the other is a little further to the top and to the right labeled

1N757.

Q. Now, is there some device such as a potentiometer or variable resistance for adjusting the thresholds of those diodes to change the position at which the ball image changed direction?

A. No, sir, there is not.

Q. What determined the location of the right edge of the screen as the position where, upon reaching it, the ball changed direction?

A. I need that read back.

(Whereupon, the previous

question was read back

by the reporter.)

THE WITNESS: The voltage

out of the integrator.

Q. And at what point did that voltage appear?

A. What? then?

Q. Is there some point on the circuit where that

A. voltage appeared?

A. On the diagram?

Q. Yes.

A. At the top right-hand side, it says three transistor

op. amp, the output of that op. amp.

Q. The section just to the right of that triangle that bears that designation?

A. That is correct, sir.

Q. Was there any provision not necessarily shown on this diagram for changing that voltage at the output of the integrator?

A. I don't understand the question, sir?

Q. Well, you stated that the means which determined the right edge of the screen as the position where the ball changed direction was the output voltage of the integrator, is that correct?

A. The output voltage level.

Q. The output voltage level of the integrator?

A. Yes, sir.

Q. Was that output voltage level variable?

A. At which point the ball would hit the wall, or change direction?

Q. Yes.

A. It was variable by changing the value of the zeners that we had referred to previously.

Q. Did you ever do that in order to change the location of the position where the ball changed direction?

A. I do not recall.

Q. I hand you now Exhibit 19 which has been identified previously as one of the notebooks of Mr. Rusch and refer you specifically to page 3 of that Exhibit 19 and ask you if you recall having seen either the diagram at the top or the diagram near the top to the right edge of that page?

A. I do not recall.

Q. I will ask you to refer to page 33 of that same exhibit - I am sorry, page 34 - and the diagram in the center of that page entitled pinball with score column; do you recall having seen that diagram?

A. By that, you mean the diagram in this book?

Q. Yes, and that is what I meant previously with respect to the diagram on page 3.

A. I do not recall at this time.

Q. Does having seen these diagrams refresh your recollection as to whether you and Mr. Rusch had bouncing of a ball image off of a fixed image on the screen rather than just the edge of the screen?

A. I do not recall, sir.

Q. Do you have any belief as to whether you had such discussions with Mr. Rusch?

A. Not at this time, sir.

Q. Did you do any further work on the wall bounce feature - strike that. Referring to Exhibit 23-145 and 146 which contained references to a pool or a billiards game, do you recall what was contemplated as to how that game or games would be played?

A. May I have the question back, please?

(Whereupon, the previous question was read back by the reporter.)

THE WITNESS: I do not recall at this time, sir; however, Exhibit 23-145 indicates to me that we were at least trying to take one spot which would be the ball to be hit and hit the cueball and cause it to move.

Q. Were you concerned on those pages only with one ball hitting another?

A. I do not recall; however, that is all I can make of it at this time.

Q. Referring to page 138 of Exhibit 23, what coincidence or coincidence of what was being referred to at the bottom of that page which has the statement,

"Disappearance on coincidence"?

A. I do not recall, sir.

MR. WELSH: This may be a good time to break for lunch.

(Whereupon, the luncheon recess was taken.)

MR. WILLIAMS: Mr. Welsh, before we resume I think Mr. Harrison had something he wanted to say about this morning's testimony.

MR. WELSH: All right.

THE WITNESS: The testimony about having discussed bouncing off a fixed symbol. I believe I understood to be in the timeframe of these pages that we had discussed earlier.

Q. Yes. Based on that answer?

A. Was that how the question was stated?

Q. I don't recall now, is there?

A. Well, at a later time I obviously did talk to him about hitting against fixed symbols.

Q. But you don't recall doing it during the time period of Exhibits 23-106 to 23-163?

A. I do not at this time.

Q. Regarding Exhibit 23-128, you stated you there were trying to get a voltage control of the delay times of delay multivibrators you had worked on previously rather than just a resistor control, did you at the time of that exhibit obtain such voltage control?

A. At the time of this Exhibit 23-128, I do not believe I did.

Q. Did you at some subsequent time?

A. Yes, sir, I am sure we did.

Q. When did that occur?

A. I do not recall, sir; however, it would have been prior to 10-24-68; and, to the best of my knowledge, after 1-23-68.

Q. Did you find something in your notebook on which you based that answer?

A. Yes, sir, Exhibit 25, page 18.

Q. And what did you find there?

A. I find a schematic diagram attached, Exhibit 23-18A.

Q. And what does 25-18A show?

A. It shows spot generators that were controlled by voltage controls.

Q. Using delay multivibrators?

A. Yes, sir.

Q. What was your reason for stating that you achieved such voltage control after January 23, 1968?

A. Because I have no record hereto indicate that I did actually construct such circuits. That I was involved - still involved - with some of Mr. Rusch's equipment.

Q. Was the manner in which you achieved the voltage control of delay multivibrators solely your idea?

A. As I recall, it was, sir.

Q. Was that idea, that circuitry, actually constructed?

MR. WILLIAMS: Which circuitry?

MR. WELSH: The circuitry that you were referring to in Exhibit 25-18A.

THE WITNESS: Exhibit 25, page 18, indicates to me that it was, sir.

Q. Do you recall a demonstration to RCA of the TV game apparatus in January of 1969?

A. I recall the demonstration; I do not recall the date.

Q. Did you have anything to do with constructing the apparatus used in that demonstration?

A. Yes, sir.

Q. And what did you have to do with that construction?

A. I constructed all the equipment, sir.

Q. Did that apparatus incorporate your voltage control of DMV's?

A. Yes, sir, it did. It requires for that generation?

Q. I ask you to now examine the various models in this room and see if you can pick out the apparatus that was used in the RCA demonstration?

A. Exhibit 35, sir.

Q. Do you also recall an earlier demonstration to TelePrompter? A little closer, would it

A. Yes, sir.

Q. Do you recall when that occurred?

A. No, sir.

Q. But it was earlier than the RCA demonstration?

Do you recall that?

A. Yes, sir, I believe it would be.

Q. Did you have anything to do with constructing the apparatus for the TelePrompter demonstration?

A. As I recall, I did. I demonstrated to TelePrompter.

Q. What did you have to do with that construction?

A. I constructed the total equipment, as I recall.

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Q. Would you now examine other models in the room and see if you can identify the apparatus that was used in the TelePrompter demonstration?

A. As best I recall, Exhibit 30.

Q. Does Exhibit 23-194 include your voltage control of the delay multivibrators for spot generation?

A. It does for spot No. 3 only.

Q. That then might fix the date when you arrived at the voltage -- such voltage control, might it not? I believe before you said it was between January 23 and October 24, the date of Exhibit 18, in 1968. This would pin it down a little closer, would it not?

A. I believe it would, sir.

Q. Was it on or before January 26, 1968?

A. I do not recall, sir.

Q. Do you have a belief in that regard?

A. It would be on or before.

Q. Referring to Exhibits 23-160, 161, 162 and 163, do those diagrams have any relation to the apparatus which was demonstrated to TelePrompter which I believe you identified as Exhibit 30?

A. Does this schematic relate to the specific equipment

that we demonstrated to TelePrompter?

Q. Yes.

A. I don't understand the words "relate to" it.

Q. Well, to be more specific, do these diagrams show what that apparatus consisted of?

A. No, sir.

Q. Are these diagrams of some other apparatus?

A. Yes, sir.

Q. What apparatus?

A. What apparatus? At the time, as I recall, this was referred to as the dv/dt.

Q. Was that apparatus constructed?

A. Were the circuits constructed?

Q. Yes.

A. Yes, sir.

Q. Were they incorporated in the apparatus that was demonstrated to RCA?

A. No, sir.

Q. Referring to Exhibits 23-118, 119 and 120, do those show circuits which were included in the apparatus demonstrated to TelePrompter, Exhibit 30?

A. I do not know that Exhibit 23-118 is complete; however, 23-119 and 23-120 I believe to be the

equipment in reference.

Q. Referring to Exhibit 25-18A again, which is the October 24, 1968, schematic, was that circuitry incorporated in the RCA demonstration unit, Exhibit 35?

A. I do not recall, sir. When you say that circuitry, you mean the circuitry that I would have taken this data or whatever on this page referring to this schematic?

Q. Yes.

A. I do not recall.

Q. What did you have to do with the demonstration to TelePrompter other than construct the apparatus?

A. I set the apparatus up in a room where the demonstration was to take place and helped out with the demonstration of the games.

Q. Were there more than one demonstration to representatives of TelePrompter?

A. As I recall, there were two.

Q. Was the same demonstration given on each occasion?

A. As I recall, it was.

Q. Would you describe either of those demonstrations to the best of your recollection, noting specifically

what games were played? Mr. Harrison, I see you are examining Exhibits 23-120, do you have any recollection apart from these circuit diagrams as to what games were demonstrated to TelePrompter?

A. It is very vague, sir.

Q. Well, what is the recollection that you do have, even though vague?

A. I recall the two eyes on the screen. We could make the round spots into hollow spots as well.

Q. Anything else?

A. I just don't recall at this time. Exhibit 23-120 indicates to me that we had a ping pong game of sorts. I agree that there is a

Q. Because there are three dot generators?

A. Three dot generators and a flipflop that would have changed the direction of the ball.

Q. Was there any wall bounce in that circuitry?

A. As I recall, there was not.

Q. I believe you stated that the circuitry of 119 and 120 in Exhibit 23 were in the TelePrompter demonstration apparatus, Exhibit 30; was the circuitry of Exhibit 23-118 not in that apparatus?

A. At this time I believe it was. The schematic is

drawn differently and I didn't catch it before.

Q. There appears to be a gap in your notes regarding the TV game apparatus from the latter part of January until November of 1968, do you recall not working on the TV game project during that period?

A. I do not recall that time period.

Q. Do you know of any reason for the gap in your notes? that an apparent problem with the ball not bouncing off the bot MR. WILLIAMS: Well, I and object. He has not testified, I don't believe, rec that there is a gap in his notes. The only

Q. testimony to that effect is yours, Mr. Welsh.

Q. Do you agree that there is a gap in your notes? That is, from January of '68 until November of

A. '68? bottom edge of the screen.

A. Yes, sir, as far as I can tell there is a gap in my notes: examination, Mr. Williams.

Q. Do you know why there is such a gap? We have no

A. I do not recall the events that would have happened to cause the gap in the notes or if some other events happened other than working on the TV games.

Q. Do you believe that you did not work on TV games during that period? followed with him?

A. I would say that I believe that I did not. At least not on a continuous basis. There may have been some spot work involved, I do not recall.

Q. Referring to Exhibit 23-158, there appears the statement, "No bounce from bottom wall," what did you mean by that?

A. Exhibit 23-158, the top half of the page indicates to me that an apparent problem with the ball not bouncing off the bottom wall was encountered and I apparently tried to make modifications to correct that problem.

Q. What was the bottom wall referred to?

A. The bottom of the screen.

Q. The bottom edge of the screen?

A. The bottom edge of the screen.

MR. WELSH: That completes my direct examination, Mr. Williams.

MR. WILLIAMS: We have no questions at this time.

MR. WELSH: I was wondering what the progress was with respect to Mr. Baer reading his transcripts and Mr. Rusch, is the same procedure being followed with him?

MR. WILLIAMS: I am not a hundred percent certain of how much of Mr. Rusch's we have. He said he would like to wait until we got the whole thing. We got some of his yesterday.

MR. WELSH: How about Mr. Baer?

MR. WILLIAMS: Mr. Baer, I am not sure.

MR. WELSH: I wonder if that can be checked into so we can make sure that we get it completed and signed and so forth?

MR. WILLIAMS: I will find out.

MR. WELSH: So we are adjourning these depositions until April 6.

MR. WILLIAMS: Yes, for the deposition of Mr. Etlinger, as I understand it.

MR. WELSH: Yes, and Mr. Seligman.

MR. WILLIAMS: Yes; Mr. Etlinger first and then Mr. Seligman.

(Whereupon, the deposition in the above-entitled
matter was concluded at 3 p.m.)

William Harrison
Deponent

THE STATE OF NEW HAMPSHIRE)
COUNTY OF *Hillsborough*) SS.

Subscribed and sworn to before me this *13th*
day of *May* 19 *76*.

Marilyn E. Trapalis
~~Justice of the Peace and/or~~
Notary Public

Marilyn E. Trapalis
Notary Public
My Commission Expires March 19, 1980